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Hull & Associates, Inc.

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December 16, 1999

Leroy Schmidt
City of Albion
112 West Cass Street
Albion, Michigan 49224

RE: Final Construction Certification Site Walkover Observations at the Albion-Sheridan Township Landfill Superfund Site
ALB025.100.0015

Dear Mr. Schmidt:

Hull & Associates, Inc. (HAI) has developed this letter on behalf of the Settling O&M Defendants (City of Albion & Decker Manufacturing, Inc.) to document our observations and concerns regarding the completed closure activities and site conditions made during the November 2, 1999 Final Certification Site-Walkover at the above referenced Site. The following is a summary of our observations or concerns:

Surface-Water Management System

There were several areas in the perimeter ditches where it appears that insufficient erosion control (i.e., rip-rap, etc.) were placed in areas of concentrated surface water flow and along portions of the perimeter ditch that made 90 degree bends. While these areas may have been constructed per the design plans, these areas will potentially be a long-term maintenance problem given the granular nature of the vegetative soils.

Specifically, these areas include an area in the northeast portion of the Site where two drainage swales and a discharge pipe from the drainage layer discharge into the eastern ditch that immediately makes a 90-degree bend. This area of concentrated flow represents a long term maintenance problem. In the northwest portion of the Site, where the perimeter ditch discharges into the northern sedimentation basin, there is no rip-rap or other erosion control mechanism. This area will also be a long term maintenance problem. In the southwest portion, the southern perimeter ditch and the rock letdown structure to the western sedimentation basin do not line-up along the same flow line. Therefore, surface water discharge from the ditch will not enter the letdown structure. This condition will likely create extensive erosion along the western perimeter slope.

Cap Erosion Issues

Due to the lack of established vegetative cover, several erosion issues are developing. Erosion rills are present at the top of the slope on the east side of the landfill under the perimeter fence; around the southwest area on the slopes and the letdown discharging into the southwest infiltration basin; and between the southwest infiltration basin and the perimeter fence.

Northwest Berm Construction

The outer slope of the northwest berm of the landfill appears to be at a slope of greater than the 1:1 and was noted to show signs (i.e., tensile crack) of movement at the top of the slope. It is HAIs opinion that this slope will continue to fail given the current slope (>1:1), the nature of the granular material used in construction, and the lack of vegetation.

Monitoring Well Repairs/ Protective Casing

Several protective casing and monitoring well stick-up elevations were noted to be less than 2.0' above grade. This condition will make it difficult to find these wells when snow is present and to see when mowing activities are completed at the Site. In addition, it was noted that monitoring well cluster #3, located in northwest portion of the Site, was located in a depression that would collect surface water. Also, observations regarding the condition of several monitor wells at the facility were noted in a letter to you dated September 7, 1999 (HAI Document #ALB025.100.0007). A more thorough inspection of the monitor well system was completed by HAI on October 27, 1999 during the first sampling event. These inspections document that there are several monitor well repairs that should be completed to ensure the integrity of the network.

Perimeter Fence

The perimeter fence installation was found to be unsatisfactory at several locations. Specifically, the vertical distance from the ground surface to the bottom of the fence was in some areas greater than two feet. In addition, the barbed wire top section of the perimeter fence was not completed along the southern and western portion of the Site.

Vegetation

The cap and associated areas were hydro-seeded. This seeding was completed in mid-October and at the time of the site walkover only a very small percentage had germinated.

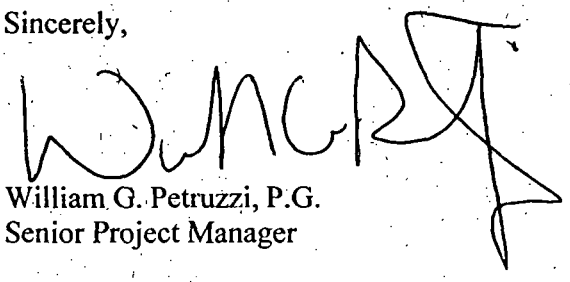
Existing Site Conditions

During construction activities, a vertical excavation was performed on a mound located at the northwest area of the landfill. The vertical face showed evidence of slumping which, if it continues, will cause the existing tree to fall, potentially affecting the integrity of the cap. Also, this slope needs to be regraded to minimize additional slope failures.

Debris piles consisting of trees and brush are present along the western edge of the landfill. These piles need to be handled and disposed of properly.

Please feel free to contact me at your convenience, should you have any questions or comments regarding the above information.

Sincerely,



William G. Petruzzi, P.G.
Senior Project Manager

WGP/pkd

ct: Bernard Konkle, Decker Manufacturing Corp.
Terry Baehr, Hull & Associates, Inc.